

DECLARATION OF LAWRENCE E. HELLER

I, LAWRENCE E. HELLER, declare as follows:

1. I am an attorney at law duly licensed to practice before the United States District Court, Central District of California. I am also a principal in the law firm of Turner, Gerstenfeld, Wilk, Tigerman & Heller. In said capacities I am responsible for the representation of the Church of Spiritual Technology ("CST" hereinafter) in the case of Religious Technology Center, et al. v. Wollersheim, et al, Case Nos. 85-711-JMI (Bx) and 85-7197-JMI (Gx), and I am (local) counsel for Author Services, Inc. ("ASI" hereinafter) in the instant case of Vicki J. Aznaran, et al. v. Church of Scientology of California, et al. Accordingly, I am familiar with all of the following facts and I am available to personally testify thereto, if necessary.

2. This Declaration is being written in response to plaintiffs' Opposition to the Motion to Recuse Judge James M. Ideman filed by the attorney for plaintiffs, Ford Greene, in the case of Aznaran v. Church of Scientology of California. Specifically, I am responding to the contentions in that Opposition that the Church of Spiritual Technology (among other entities) has moved to disqualify Judge Ideman for purely tactical purposes. Attorney Greene also asserts in his opposition that the Church of Spiritual Technology (along with other defendants) has a "history of maintaining extreme litigation practices, the objective of which is, solely, to win at any cost." (Pages 1 and 2 of Opposition.)

1 3. Attorney Greene's contentions in this regard are,
2 to say the least, ironic in view of the fact that CST is not a
3 party to the Aznaran litigation. Furthermore, the defendant that
4 I do represent in the Aznaran litigation, ASI, has not joined in
5 the Motion Disqualify Judge Ideman.

6 4. Furthermore, it is of note that neither ASI nor CST
7 instigated the litigation in which they are respectively involved.
8 ASI was sued as a defendant in the Aznaran litigation even though
9 neither of the Aznarans, to this declarant's knowledge, were
10 employed by or worked for ASI. It is undisputed that CST, a
11 counter-defendant in the Religious Technology Center litigation,
12 was incorporated after counter-claimant David Mayo departed from
13 the Church of Scientology. Accordingly, CST had neither any
14 connection with nor ever contact with Mr. Mayo. Nevertheless it was
15 sued.

16 5. The Religious Technology Center litigation deals
17 with copyright infringement and related claims. CST does not hold
18 or license any of the copyrights at issue nor has it ever,
19 throughout the course of its tenure, given any religious, or other,
20 services to Scientology parishioners, other than to its own staff
21 members. Accordingly, it is this declarant's contention that
22 neither ASI nor CST should even be parties to either of the subject
23 litigations.

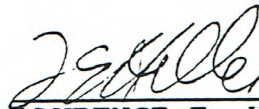
24 6. I have personally represented both ASI and CST for
25 a number of years. To my recollection, I have never been attorney
26 of record for either of these entities as plaintiffs in any
27

1 lawsuits. Based thereon, attorney Greene's assertion that CST (or
2 even ASI for that matter) have engaged in "extreme litigation
3 practices" in order "to win at any cost" is absurd.

4 7. Plaintiffs' opposition also intimates that CST,
5 among other Scientology entities, in some unspecified fashion has
6 engaged in unethical litigation practices. I hereby state
7 unequivocally that no one at either CST, ASI or, for that matter,
8 any other Scientology entity or organization has ever requested
9 that I engage in any unethical or harrassive litigation tactics.
10 In fact, I would challenge the plaintiffs and their counsel to
11 point out any actions which my clients have taken in either the
12 Aznaran or the Religious Technology Center litigation which he, or
13 anyone else, could consider harrassive.

14 I declare under penalty of perjury that the foregoing is
15 true and correct.

16 Executed this 16th day of October, 1991, at Beverly
17 Hills, California.

18
19 

20 LAWRENCE E. HELLER